

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC. 20554

In the Matter of	)	
	)	RM - 10867
Changes in Part 97	)	
With Regard to Amateur Radio	)	RM - 10870
Service Restructuring	)	

**To: The Commission**

I would like to thank the Commission for the opportunity to comment on RM-10868. I am Amateur Radio Operator KC0ARF who was licensed in 1997, and I am a Technician Class operator. I am particularly active in Skywarn weather collection activities, along with Amateur Radio social activities.

**Short Statement**

I am **in favor** of these proposals, and given the choice, prefer RM-10870 sponsored by the National Conference of Volunteer Examiner Coordinators (NCVEC).

**Amateur Radio Service Restructuring**

I **agree** with both proposals that it is time to re-structure the Amateur Radio Service (ARS).

**Technician Class is not an appropriate Entry-Level License**

I **agree** with both proposals that the Technician Class licensee is not an appropriate Entry-Level License. The Technician Class features **all** Amateur privileges above 50 MHz, including the ability to setup digital computer networks, repeater systems with remote receive sites, high-power microwave and amateur television, and remote command of a space station. Technicians have achieved a lot in the United States, and a number of them managed to achieve this level of achievement without learning Morse Code (CW). It is not logical that because of a singled method of communication (CW), the powerful Technician class cannot operate below 50 MHz.

I was licensed in 1997, and had to pass the Novice written, and the Technician written. I did not pass a Morse Code exam. I entered the world of Amateur Radio, and am thankful that older, more experienced amateurs were available to assist me, and remind me of safety and installation procedures. I know that I made several mistakes while operating my station, and am again thankful for peer guidance and correction. Today, I mentor other younger hams, but feel that our license does feature too many privileges for a beginner.

I support a restricted Entry-Level License, and prefer the NCVEC solution as specified in RM-10870. I think that with those reasonable restrictions, a newly licensed Amateur Radio operator "Communicator" may explore most of the world of Amateur Radio (such as data, CW, voice, PSK31, and other modes), and "learn the ropes" to acquire the proper wisdom.

#### **Amateur Radio Service Class Promotion**

I **support** both proposals' request to reclassify the License and offer promotions. As explained in both proposals, the Technician Class holds all privileges above 50 MHz, and assuming that the Commission agrees with the creation of a new Entry-Level License, it would be wrong to downgrade them to the Novice / Communicator level. Imagine the administrative nightmare of re-classifying all of the communications assets belonging to members of the Technician class.

#### **The NCVEC Communicator vs. ARRL "New" Novice**

I **support** the NCVEC solution as outlined in RM-10870. After drawing out the proposed frequency allotments, I feel that the Communicator license with the greater restrictions are more applicable to a beginner. The proposed Communicator license will have quite a few privileges available to them to explore and train for the hopeful eventual upgrade to General.

#### **The Morse Code Question**

Morse Code (CW) is a method of communication. In the very early days of radio, before the invention of the microphone, CW was the only way to communicate via radio. As our technology advanced, human speech became possible over radio, followed by data communication using computers.

Until World Radio Conference 2003 (WRC-03), Morse Code was an international requirement for Amateur Radio Operators that nations of the world respected. In July 2003, the WRC voted to remove the code requirement internationally, leaving it up to the individual countries to determine if Morse code should be examined. As of this writing, a number of countries have relaxed the Morse Code requirements, and have promoted their citizens to use frequencies below 50 MHz. It is now time for the United States to follow suit.

I **support** the removal of Morse Code as a license examination requirement as specified in RM-10870. Morse code is not a test of an operator's technical knowledge, or of his/her character. Morse code exams test an operator to see if he or she can recognize patterns of sounds, and decode them into text. Morse code is not the *standard* method of communication—human *speech* is.

The ARRL's proposal in RM-10867 removes the Morse requirement for General class. I feel it should be removed for all classes as proposed in RM-10870.

Some members of the hobby may claim that the removal of CW will "dumb down" the hobby, or perhaps fear that members of the Citizens Band (CB) will migrate to the Amateur Radio Service, and cause "all hell to break loose". I would counter their arguments that CW is merely a mode, not a way of life. The removal of the "code barrier" will attract other citizens back to ham radio, and with proper elmering (internal Amateur Radio Training), these operators should raise the collective intelligence of the service. I would also remind doomsday population that Amateur Radio Service is an internally-policed service, and that the off-color antics of the Citizens Band service will be met with resistance. It is also important to note that Citizens Band equipment might run \$150 new, whereas proper amateur gear will run over \$500.

#### **Re-farming of the High Frequency (HF) Bands**

I **support** the re-farming of the HF Bands as suggested by RM-10870. Recent proposals in the database (RM-10867 - 10870) suggest that HF is very active, especially in the voice partitions of the bands. I support the larger expansions offered by RM-10870.

#### **Conclusion**

I sincerely thank the Commission for making these two proposals available for comment. I think both RM - 10867 and RM 10870 strongly consider the future of Amateur Radio here in the United States... they are well thought-out and with your favorable ruling, will answer a number of internal questions within the Amateur Radio Service.

Of the two proposals offered here, if I had to choose one over the other, I would select RM-10870.

Thank you for your attention.

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